

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DENNIS DIMON,)	
)	
Plaintiff,)	
)	
VS.)	
)	C. A. No: 05-11073 WGY
METROPOLITAN LIFE)	
INSURANCE COMPANY, KEMPER)	
INSURANCE COMPANY,)	
MORGAN STANLEY DW, INC.,)	
MICHAEL B. LATTI, LATTI)	
ASSOCIATES, and LATTI &)	
ANDERSON LLP,)	
)	
<u>Defendants.</u>)	

MOTION TO EXTEND DEPOSITION DEADLINE

Defendant Metropolitan Life Insurance Company (“MetLife”) requests the Court extend the deadlines for taking the depositions of Kemper Insurance Company (hereinafter “Kemper”), plaintiff Dennis Dimon and Katherine Dimon, plaintiff’s wife.

As grounds for this Motion, MetLife represents that it has made good faith efforts to comply with the Court’s pretrial deadline regarding non-expert discovery, which is currently set for June 15, 2006. The Moving Parties agreed to extend the non-expert deposition deadline until June 15, 2006, but only for the limited purpose of taking those depositions that were noticed prior to May 15, 2006 and for no other purpose. Due to scheduling conflicts and witness availability issues, the above listed depositions will not be taken before the current deadline.

MetLife respectfully requests that the current deadline for taking non-expert depositions, as limited by the Court's May 15, 2006 Order, be extended from June 15, 2006 until July 15, 2006.

Defendant,
Metropolitan Life Insurance
Company
By its Attorneys,

/s/ Peter LeBlanc
James J. Ciapciak, BBO # 552328
Peter LeBlanc, BBO # 645305
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed via the ECF system and will be served electronically through that system upon Counsel of Record on June 15, 2006.

/s/ Peter LeBlanc
Peter LeBlanc

LOCAL RULE 7.1 CERTIFICATE OF CONSULTATION

I hereby certify that on June 14, 2006, the undersigned conferred with opposing counsel in an attempt to narrow the issues presented by this Motion.

/s/ Peter LeBlanc
Peter LeBlanc